REMARKS

Claims 1, 2, 4-6, 8-16, 18-26, 39-42, 45, 47 and 48 were pending in the Application prior to the outstanding Office Action. In the Office Action, claims 1, 2, 4-6, 8-16, 39-42, 45, 47 and 48 were rejected under 35 U.S.C. §103(a).

I. RESPONSE TO REJECTIONS UNDER 35 U.S.C. §103(a)

On page 2 of the Office Action mailed May 4, 2007, the Examiner rejected claims 1, 2, 4-6, 8-16, 18-26, 39-42, 45, 47 and 48 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,470,227, issued to Rangachari et al. ("*Rangachari*"), in view of U.S. Patent No. 6,463,352, issued to Tadokoro et al. ("*Tadokoro*"), further in view of U.S. Patent No. 6,944,584, issued to Tenney et al.("*Tenney*").

A. Independent Claim 1 Patently Distinguishes Over *Rangachari* in view of *Tadokoro*, and further in view of *Tenney*

Rangachari does not teach or suggest "receiving a first request from the remote client system via the first network." In contrast, *Rangachari* teaches that a fab application server executes predefined workflows to manage tools. Take the example provided by *Rangachari* for managing the loading of wafers from a pod into a tool (*see* Col. 7, lines 49-53):

> "when wafer lots contained in Pod 44 must be loaded in the equipment 40 for processing, the Fab Application Server 51 would send commands to other application servers 49 and MES 46 to accomplish the task."

Neither the fab application server nor any of the application servers comprise a "remote client system." *Rangachari* teaches that the application servers 49 (including the fab application server 51) are each a component of the equipment manager 18, which is part of the computer program 10 (shown as a dashed line in Fig. 1). *See generally* Col. 6. The only component disclosed in *Rangachari* that may possibly be described as a "remote client system" (that is remote from the computer 10) is MES 46. However, *Rangachari* does not teach or suggest that the fab application server 51 receives a request from the MES 46. In fact, *Rangachari* teaches away from that concept. The language quoted above from *Rangachari* discloses that the fab application server 51 sends commands to MES 46, and does not received commands from MES

46. In addition, the Examiner notes that *Rangachari* does not teach or suggest the second element recited in claim 1, namely "determining a first type of said first request based at least in part on a first predetermined field contained in said first request." Therefore, Applicants respectfully assert that the method recited in claim 1 is not obvious over *Rangachari*.

Moreover, the method recited in claim 1 is not obvious over *Rangachari*, in view of *Tadokoro*, either alone, or in combination with each other. The Examiner suggests that *Tadokoro* provides the second element recited in claim 1, which is not taught or suggested by *Rangachari*. However, *Tadokoro* discloses that the unique IP address referred to by the Examiner is associated with a virtual machine object 5 (*see* Fig. 2a-2b). *Tadokoro* teaches that each virtual machine object 5 is connected to a single tool. Thus, the virtual machine object cannot comprise "a tool server … coupled with a plurality of tools via a second network." Therefore, the method recited in claim 1 is not obvious over *Rangachari* in view of *Tadokoro*.

In addition, *Tenney* does not teach or suggest the elements missing from the teaching of *Rangachari* and *Tadokoro*, either alone, or in combination. In particular, *Tenney* does not teach or suggest "determining a first type of said first request based at least in part on a first predetermined field contained in said first request." *Tenney* simply discloses a client-server network whereby a user may create object-oriented robotic control programs remotely. *Tenney* does not teach or suggest how the components of the network send/receive messages.

Therefore, Applicants respectfully assert that the method recited in claim 1 is not obvious over the combination of *Rangachari*, *Tadokoro* and *Tenney*, either alone or in combination with each other.

B. Dependent Claims 2, 4-6, 8-14, 39-40 and 47 Patently Distinguish Over *Rangachari* in view of *Tadokoro*, and further in view of *Tenney*

Dependent claims 2, 4-6 and 8-14 depend directly or indirectly from independent claim 1. These dependent claims include all of the limitations of the independent claim from which they depend. Applicants respectfully assert that dependent claims 2, 4-6 and 8-14 are allowable for at least the reasons set forth above concerning independent claim 1.

C. **Independent Claim 15 Patently Distinguishes Over *Rangachari* in view of *Tadokoro*, and further in view of *Tenney***

Claim 15 recites:

"circuitry on a tool server, coupled with a remote client system via a first network and coupled with a plurality of tools via a second network, configured to receive a first request from the remote client system via the first network;

said circuitry configured to determine a first type of said first request based at least in part on a first predetermined field contained in said first request; and

said circuitry configured to send a first message to one of said plurality of tools via the second network in response to said first request and said first type, wherein said first message is operable for controlling an action of said one of said plurality of tools;

wherein the remote client system comprises a user interface to said one of said plurality of tools."

For at least the same reasons discussed above regarding claim 1, the system recited in claim 15 is not obvious over *Rangachari*, *Tadokoro* or *Tenney*, either alone or in combination with each other. Namely, *Rangachari*, *Tadokoro* or *Tenney*, either alone or in combination with each other do not teach or suggest the circuitry on a tool server recited in claim 15.

D. **Dependent Claims 16, 18-26, 41-42, 45 and 48 Patently Distinguish Over *Rangachari* in view of *Tadokoro*, and further in view of *Tenney***

Dependent claims 16, 18-26, 39-42, 45 and 47-48 depend directly or indirectly from independent claim 15. These dependent claims include all of the limitations of the independent claim from which they depend. Applicants respectfully assert that dependent claims 16, 18-26, 39-42, 45 and 47-48 are allowable for at least the reasons set forth above concerning independent claim 15.

Additional Remarks

The references cited by the Examiner but not relied upon have been reviewed, but are not believed to render the claims unpatentable, either singly or in combination.

In light of the above, it is respectfully submitted that all of the claims now pending in the subject patent application are allowable, and a Notice of Allowance is requested.

Enclosed is a PETITION FOR EXTENSION OF TIME UNDER 37 C.F.R. §1.136 for extending the time to respond up to and including today, August 28, 2007.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 50-1826 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: August 28, 2007 By: / Scott D. Sanford /

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